

# EXHIBIT 6

**JSG Ex. 6**

**In Re: Terrorist Attacks on September 11, 2001 (03 MDL 1570)**

**KEY DATES IN DOCUMENT PRODUCTIONS SINCE COMMENCEMENT OF MERITS/JURISDICTIONAL DISCOVERY**

**MUSLIM WORLD LEAGUE – INTERNATIONAL ISLAMIC RELIEF ORGANIZATION<sup>1</sup>**

**Dates And Summaries of Document Productions**

October 28, 2005 – Plaintiff serve their Consolidated First Set of Requests for Production of Documents on MWL.

December 13, 2005 – Plaintiffs serve their Consolidated First Set of Requests for Production of documents on IIRO.

January 19, 2006 – MWL served responses (without documents).

February 24, 2006 – IIRO served responses (without documents).

March 8, 2006 – MWL produces 5,121 pages of documents during meet and confer (21 binders of documents and 4 loose packets of documents) – JT-MWL00001-05121.

August 1, 2007 – IIRO produces 748 pages of documents.<sup>2</sup>

October 17, 2007 – MWL makes available for inspection 12 boxes of documents and 6 computer hard drives during meet and confer.

October 17, 2007 – Meet and confer with agreement as to initial priorities.

October 19, 2017 – Confirming email from MWL/IIRO counsel.

October 23, 2007 – IIRO produces IIRO00001 - IIRO00740.<sup>3</sup>

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<sup>1</sup> Correspondence, telephone calls and many of meet and confers excluded.

<sup>2</sup> No bates numbers.

<sup>3</sup> These appear to be bates-stamped versions of the docs produced on August 1, 2007.

### Dates And Summaries of Document Productions

November 2007 – Six computer hard drives imaged from McMahon’s office.

April 28, 2008 – IIRO produces IIRO000001-IIRO001139.<sup>4</sup>

October 28, 2008 – IIRO produces IIRO001140-IIRO004069.<sup>5</sup>

January 11, 2011 – Court issues Discovery Order as to MWL/IIRO.

March 16, 2011 – Motion to Compel – MWL/IIRO.

March 24, 2011 – Motion to Compel – IIRO.

April 5, 2011 – Defendants produce 2,634 pages of documents 2,412 pages of docs and 212 pages of three brochures relating to the opening of an Islamic Cultural Center in Madrid. 1,781 pages of the 2,412 had been produced earlier by the defendants (74%) (no bates numbers).

April 7, 2011 – Plaintiff’s Reply to April 1, 2011 Letter Brief of MWL-IIRO.

April 12, 2011 – Discovery Hearing before Judge Maas.

April 21, 2011 – Plaintiff’s Letter Brief.

April 26, 2011 – Discovery Hearing before Judge Maas.

April 26, 2011 – (ECF 2424) Discovery Order.

May 20, 2011 – Defendants produce 846 pages of documents – IIRO000001-846.<sup>6</sup>

June 23, 2011 – (ECF 2442) Discovery Order.

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<sup>4</sup> Partially duplicative of the production on October 23, 2007.

<sup>5</sup> Defendants asserting that they have now produced 4,069 pages of “responsive” documents.

<sup>6</sup> Bates numbers overlap with prior productions; different documents.

### Dates And Summaries of Document Productions

June 23, 2011 – Discovery Conference, Judge Maas.

July 8, 2011 – MWL produces 1,274 pages of documents – MWL005122-6395.

July 8, 2011 – IIRO produced 768 pages of documents<sup>7</sup> – IIRO004070-4839.

July 13, 2011 – Discovery Conference, Judge Maas.

July 26, 2011 – (ECF 2450) Discovery Order.

August 26, 2011 – Defense counsel advises Plaintiffs that he has another production in his office from the defendants totaling approximately 12,000 pages.

August 26, 2011 – 2011 Sanctions Motion.

November 16, 2011 – Discovery Conference, Judge Maas.

November 18, 2011 – MWL/IIRO produces IIRO004840-016593.

December 19, 2011 – MWL/IIRO produces IIRO016594-016767.

January 10, 2012 – MWL/IIRO produces IIRO016768-018473.

January 18, 2012 – MWL/IIRO produces IIRO018474-025058.

February 28, 2012 – MWL/IIRO produces IIRO025059-031000.

April 1, 2012 – Letter from Mr. McMahon regarding new counsel.

May 16, 2012 – MWL/IIRO produces IIRO031001-031214.

May 17, 2012 – MWL/IIRO produces IIRO031215-34202.

August 30, 2012 – MWL and IIRO produce 0 additional documents on document production deadline.

<sup>7</sup> All were merely a reproduction of documents that had been produced on May 20, 2011, but now with updated bates numbers.

### Dates And Summaries of Document Productions

September 2012 – Plaintiffs hire Golkow Technologies to copy/scan boxes and other documents in Martin McMahon’s Washington D.C. office – MWLIIRO-0000001-114255.

January 8, 2013 – Eric Lewis files Notice of Appearance on behalf of the MWL and IIRO.

April 16, 2013 – Meet and confer at courthouse.

May 1, 2013 – Confirm a meet and confer agreement from counsel for MWL/IIRO.

June 28, 2013 – Discovery Hearing before Judge Maas.

September 6, 2013 – MWL produces MWL006396-8627.

September 6, 2013 – IIRO produces IIRO034203-34943.

September 26, 2013 – MWL produces MWL008628-8690.

September 26, 2013 – IIRO produces IIRO034944-37838.

October 21, 2013 – MWL produces MWL008691-8698.

October 21, 2013 – IIRO produces IIRO037839-42012.

November 22, 2013 – IIRO produces IIRO042013-045402.

December 16, 2013 – MWL produces MWL008699-008704 (including a single-page chart identifying to which RFPs these documents are responsive).

December 16, 2013 – IIRO produces IIRO045403-049895 (including a 9-page chart identifying to which RFPs these documents are responsive).

January 9, 2014 – MWL produces MWL008705-8814 (including a single-page chart identifying to which RFPs these documents are responsive).

January 9, 2014 – IIRO produces IIRO049896-57869 (including a 113-page chart identifying to which RFPs these documents are responsive).

January 30, 2014 – MWL produces MWL008815-8914 (including a single-page chart identifying to which RFPs these documents are responsive).

January 30, 2014 – IIRO produces IIRO057870-69066 (including a, 89-page chart identifying to which RFPs these documents are responsive).

### Dates And Summaries of Document Productions

February 10, 2014 – IIRO produces IIRO069067-93323 (including single-page chart identifying to which RFPs these documents are responsive).

February 25, 2014 – MWL produces MWL008915-13859 (including 106-page chart identifying to which RFPs these documents are responsive).

February 25, 2014 – IIRO produces IIRO093324-111016 (including 165-page chart identifying to which RFPs these documents are responsive).

March 11, 2014 – MWL produces MWL013860-15867 (including 77-page chart identifying to which RFPs these documents are responsive).

March 11, 2014 – IIRO produces IIRO111017-115864 (including 94-page chart identifying to which RFPs these documents are responsive).

April 8, 2014 – MWL produces MWL015868-16156 (including 25-page chart identifying to which RFPs these documents are responsive).

April 8, 2014 – IIRO produces IIRO115865-125715 (including 206-page chart identifying to which RFPs these documents are responsive).

April 29, 2014 – MWL produces MWL016157-18683 (including 112-page chart identifying to which RFPs these documents are responsive).

April 29, 2014 – IIRO produces IIRO125716-130658 (including 116-page chart identifying to which RFPs these documents are responsive).

May 22, 2014 – MWL produces MWL018684-23015 (including 257-page chart identifying to which RFPs these documents are responsive).

May 22, 2014 – IIRO produces IIRO130659-148696 (including 50-page chart identifying to which RFPs these documents are responsive).

June 19, 2014 – MWL produces MWL023016-31420 (including 546-page chart identifying to which RFPs these documents are responsive).

June 19, 2014 – IIRO produces IIRO148697-149867 (including 9-page chart identifying to which RFPs these documents are responsive).

July 29, 2014 – MWL produces MWL031421-39183 (including 563-page chart identifying to which RFPs these documents are responsive).

July 29, 2014 – IIRO produces IIRO149868-167792 (including 32-page chart identifying to which RFPs these documents are responsive).

August 28, 2014 – MWL produces MWL039184-39348 (including 8-page chart identifying to which RFPs these documents are responsive).

August 28, 2014 – IIRO produces IIRO167793-179284 (including 79-page chart identifying to which RFPs these documents are responsive).

November 7, 2014 – MWL produces MWL039349-45401 (including 20-page chart identifying to which RFPs these documents are responsive).

### Dates And Summaries of Document Productions

November 7, 2014 – IIRO produces IIRO179285-270038 (including 152-page chart identifying to which RFPs these documents are responsive).

December 11, 2014 – MWL produces MWL0045402-50903 (including 4-page chart identifying to which RFPs these documents are responsive).

December 11, 2014 – IIRO produces IIRO270039-277249 (including 81-page chart identifying to which RFPs these documents are responsive).

December 15, 2014 – MWL produces MWL0050904-58834 (including 618-page chart identifying to which RFPs these documents are responsive).

December 15, 2014 – IIRO produces IIRO277250-285593 (including 41-page chart identifying to which RFPs these documents are responsive).

December 19, 2014 – MWL produces MWL0058835-059162 (including 4-page chart identifying to which RFPs these documents are responsive).

December 19, 2014 – IIRO produces IIRO285594-286648 (including 2-page chart identifying to which RFPs these documents are responsive).

February 11, 2015 – IIRO produces IIRO286649-286953 (including 1-page chart identifying to which RFPs these documents are responsive).

July 31, 2015 – IIRO produces IIRO286955-286988 (including 1-page chart identifying to which RFPs these documents are responsive).

October 23, 2015 – MWL produces MWL0059163-059247 (including 1-page chart identifying to which RFPs these documents are responsive).

October 23, 2015 – IIRO produces IIRO286989-287187 (including 3-page chart identifying to which RFPs these documents are responsive).

December 4, 2015 – MWL produces MWL0059248-059345 (including 1-page chart identifying to which RFPs these documents are responsive).

December 4, 2015 – IIRO produces IIRO287188-287384 (including 1-page chart identifying to which RFPs these documents are responsive).

December 10, 2015 – IIRO produces IIRO287385-287411 (including 1-page chart identifying to which RFPs these documents are responsive).

March 22, 2016 – MWL produces MWL0059346-059366 (including 1-page chart identifying to which RFPs these documents are responsive).

March 22, 2016 – IIRO produces IIRO287412-287606 (including 1-page chart identifying to which RFPs these documents are responsive).

December 30, 2016 – MWL produces MWL0059367-061012 (including 13-page chart identifying to which RFPs these documents are responsive).

December 30, 2016 – IIRO produces IIRO287607-305368 (including 42-page chart identifying to which RFPs these documents are responsive).

Dates And Summaries of Document Productions
March 1, 2017 – MWL produces MWL0061013-62409 (including 9-page chart identifying to which RFPs these documents are responsive).
March 1, 2017 – IIRO produces IIRO305369-319550 (including 158-page chart identifying to which RFPs these documents are responsive).
March 23, 2017 – MWL produces MWL0062410-64631 (including 31-page chart identifying to which RFPs these documents are responsive).
March 23, 2017 – IIRO produces IIRO319551-334699 (including 178-page chart identifying to which RFPs these documents are responsive).
March 30, 2017 – IIRO produces IIRO334700-338421 (including 165-page chart identifying to which RFPs these documents are responsive).
June 16, 2017 – MWL produces MWL0064632-75354 (including 295-page chart identifying to which RFPs these documents are responsive).
June 16, 2017 – IIRO produces IIRO338422-339257 (including 16-page chart identifying to which RFPs these documents are responsive).
July 24, 2017 – IIRO produces IIRO339258-3413437 (including 34-page chart identifying to which RFPs these documents are responsive).
August 4, 2017 – MWL produces MWL0075355-83966 (including 46-page chart identifying to which RFPs these documents are responsive).
August 10, 2017 – MWL produces MWL0083967-102974 (including 106-page chart identifying to which RFPs these documents are responsive).
August 15, 2017 – MWL produces MWL0102975-118653 (including 82-page chart identifying to which RFPs these documents are responsive).
August 18, 2017 – IIRO produces IIRO341438-341981 (including 15-page chart identifying to which RFPs these documents are responsive).